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**Attachment A to
AT&T Second Motion to Compel**

April 2, 2003

Mr. Karl B. Anderson
Mr. Mark Ortlieb
Ms. Louise A. Sunderland
SBC Illinois
225 West Randolph Street
Floor 25D
Chicago, IL 60606

Re: ICC Docket No. 02-0864

Dear Mr. Anderson, Mr. Ortlieb and Ms. Sunderland:

In an attempt to reasonably resolve discovery differences, AT&T requests that SBC Illinois reconsider its responses to the AT&T Data Requests discussed below and provide the requested information. I would be happy to discuss these with you on an individual basis as soon as you are prepared to do so rather than wait and discuss them all at once:

SBC's Response to AT&T Data Request MS-6: AT&T Data Request MS-6, served upon SBC Illinois on February 19, refers to Mr. Barch's statement at page 46 of his direct testimony regarding SBC Illinois's need to remove "customer-generated service order activity" expenses from SBC's derivation of maintenance factors on the basis that such expenses are already being recovered by its Service Order cost studies. AT&T, in its Data Request, requests that SBC identify the total amount of revenue generated by SBC Illinois for "customer-generated service order activity" for years 1999, 2000, 2001 and 2002, including the total number of "customer generated service order[s]" and the total revenue SBC Illinois assessed specific to those service orders.

SBC objected to AT&T Data Request MS-6 on the grounds that the requested information is not relevant in this proceeding and that SBC Illinois's revenue data is filed annually with the FCC in the ARMIS 43-02 and can be found at the FCC's ARMIS website. As an initial matter, SBC's objection that Data Request MS-6 is irrelevant is not legitimate. Specifically, SBC removes Service Order Activity costs from its ACF calculation in the following file: "*ACF_2001_IL_STD_10-15-2002*", Tab: "*Expense Data*," Cell: I5. SBC's support for this adjustment is included in file: "*Illinois SOAA 2001*", which is a 1998 study

based upon information from Texas, Missouri, Kansas, Oklahoma and Arkansas. No Illinois-specific or Ameritech region-specific data is included in this study. AT&T requires the requested revenue data to update SBC's calculation and to attempt to make the calculation as Illinois-specific as possible. To do so, AT&T needs the amount of revenue generated by SBC Illinois for customer-generated service order activity for the years in question and the total number of such service orders and the total revenue SBC Illinois allocated to those service orders for the years in question.

The ARMIS data to which SBC refers in its data request response is completely nonresponsive to AT&T's Data Request MS-6. This ARMIS data provides total revenue by service at the prime account level and does not, in any way, break out the revenue generated by customer-generated service order activity. The requested revenue data is most likely contained within the specific sub-accounts, therefore requiring that SBC provide the general ledger detail of the relevant revenue accounts at the sub-account level. If the sub-accounts containing revenue for customer-generated service order activity include revenue associated with other activities and services as well, then specific identification of revenue attributable to customer-generated service order activity only is required.

SBC Response to AT&T Data Request MS-15: AT&T Data Request MS-15 specifically requests a complete copy of the MR2000 report and supporting documentation. The MR2000 report is the source document for the numbers identified in the cells of SBC's shared and common cost study as reflected in AT&T Data Request MS-15. Rather than provide a complete copy as requested, SBC provided AT&T a query from its MR2000 reports that merely provides information that SBC has already provided in its shared and common cost study. AT&T requires the entire MS2000 report in order to determine whether SBC failed to include expenses it should have included or whether SBC included expenses it should not have. The MR2000 report, which SBC itself relied upon in preparing its shared and common cost study, is clearly relevant and AT&T insists that it be provided with the entire report and supporting documentation.

SBC Responses to AT&T Data Requests MS-31, MS-32 and MS-33: In response to AT&T Data Requests MS-31, MS-32 and MS-33, SBC indicates that the specific data requested in those three requests is "not readily available" and "would require an unforeseen amount of dedicated real estate human and financial resources to develop a means to collect, store, and maintain such data on an on-going basis." Please identify the individual(s) responsible for preparing these three responses. AT&T has good reason to believe that SBC Illinois does, indeed, maintain information of this type. For example, as part of its direct case, SBC Illinois provided information regarding the addresses of the locations in which it leases and/or owns space and the square footage of that space indicating that SBC Illinois operates some form of building space inventory system. It is also AT&T's understanding that SBC is required to maintain affiliate transaction contracts and records which would include information for space and land leased, rented or subleased to its affiliates. Similarly, SBC Illinois, as a matter of standard business practices, should maintain contracts and/or tariff billing records related to space leased to non-affiliated entities. With respect to AT&T Data Request MS-32, an identification of the square footage by type under contract or lease from SBC Illinois to non-affiliated third parties would be an acceptable response. With respect to the identification of collocation space requested in AT&T Data Request MS-31, AT&T is aware that SBC was recently able to provide in Excel spreadsheet format a detailed identification of collocation space on a central office by central office basis in the California proceeding. Similarly, with respect to AT&T Data Request MS-33, in the current Texas UNE costing case,

SBC produced a detailed Excel spreadsheet display of space leased by Southwestern Bell (SBC Texas) to affiliated entities apparently based on affiliate billing records by location, entity and space classification. Please provide the requested data here.

SBC Response to AT&T Data Request MS-98 Based upon the resolution of AT&T's Motion to Compel regarding AT&T Data Request MS-100, AT&T requests that SBC either produce – or confirm that AT&T may use -- the utilization factors approved by the IURC in Docket No. 40611 in this proceeding.

SBC Response to AT&T Data Request BFP-25: AT&T Data Request BFP-25 requests the specific changes SBC plans to make to its current engineering methods and procedures based on SBC's publicly stated plans to "rearchitect its network" based on its Project Pronto deployment. SBC objects to this request based on the grounds that it is overly broad, unduly burdensome, and is not reasonable calculated to lead to the discovery of relevant evidence. SBC's objection is unfounded. Forward-looking engineering methods and procedures are the focus of TELRIC proceedings and AT&T has every right to ask SBC any plans it has to change those procedures based on its deployment of forward-looking technology, such as Project Pronto. The request is not overly burdensome, as either SBC has or does not have plans to change its engineering methods and procedures based on its Project Pronto deployment. If it does, we ask SBC to identify those changes. If it does not, then SBC should answer as such. Please provide a response to this request.

SBC Response to AT&T Data Request BFP-43: AT&T Data Request BFP-43 asks SBC to provide a copy of the Operating Practice ("OP") for SBC Supplier Contracting and to identify – with documentation -- how SBC Illinois followed the contracting process contained in the OP for affiliate transactions. SBC responded to this request by stating that it does not use the OP for affiliate transactions and, therefore, that "there is no document responsive to this request." However, BFP-43 clearly asks SBC to provide two sets of documents: (1) the OP, and (2) documents concerning use of the OP in affiliate transactions. While SBC's answer addresses the second part of this request, it ignores the fact that AT&T has requested the OP. Please produce the "Operating Practice No. 6 (OP-6), "SBC Supplier Contracting."

SBC Response to AT&T Data Requests BFP-112 and BFP-114: SBC's responses to AT&T Data Requests BFP-112 and BFP-114 attach the Alcatel switch contracts. AT&T Data Request BFP-114 asked for the complete and current contract. The most recent amendment provided is dated October 15, 2002. Simply confirm that there is not a more recent version or amendment to the Alcatel contracts.

SBC Response to AT&T Data Request BFP-118: AT&T Data Request BFP-118 requests SBC to provide all documentation, assumptions, studies, work papers, and any other support for SBC's assumptions concerning the use of NIDs versus block terminals in serving multi-line business customers (for each zone). SBC's response does not provide the underlying data used to derive the file that it cited to, which was produced with SBC's initial filing. Moreover, AT&T Data Request BFP-118 requests that SBC provide a description of how the lines-in service were determined. SBC's response is incomplete. Specifically, SBC's response does not identify the original source of the underlying data, the queries and extracts used to pull the data from SBC's systems, any assumptions or exclusions in using this data, or the methodology and assumptions used to summarize this information. In this request, AT&T is seeking a complete understanding of the methodology employed by SBC for deriving such data, including the underlying source data and what that source data represents.

SBC Response to AT&T Data Request BFP-156 AT&T Data Request BFP-156 requests that SBC provide: (i) all documentation that established the planned use of Universal DLC in SBC's Project Pronto architecture, (ii) an explanation of how much and where Universal DLC will be used in the Project Pronto architecture, and (iii) all documents related to or used in providing the response and all documents, information or communications relevant to the request. SBC responded to this request by simply stating that it does not have a "planned percentage" of UDLCs for use in Project Pronto. This response is incomplete. AT&T Data Request BFP-156 also asked SBC to explain how much and where UDLC will be used in the Project Pronto architecture, to explain the basis of its decision, and to produce all documents relating to that decision. Simply because SBC has not "picked" a specific percentage of UDLCs for use in the Project Pronto architecture does not mean that SBC has not made more general decisions concerning how much and, more particularly, where it will deploy UDLC within the Project Pronto deployment. Please supplement this response by explaining where (i.e., in what instances) SBC plans on deploying UDLC within the Project Pronto architecture. Please produce all documents relating to the same.

SBC Response to AT&T Data Request BFP-194 AT&T Data Request BFP-194 requests the information noted therein at the "expenditure type level (i.e., EXTC) showing descriptions of each expenditure type." SBC's response refers AT&T to SBC's response to Staff Data Request PL 2.11(a). The information SBC provided in response to Staff Data Request PL 2.11(a) is not provided at the "expenditure type level" but at a level of detail that does not comply with nor satisfy AT&T's request. Please provide the requested information at the "expenditure type level ... showing descriptions of each expenditure type."

SBC Response to AT&T Data Request BFP-195 AT&T Data Request BFP-195 requests all documentation, assumptions, studies, work papers and any other support for the Engineered, Furnished & Installed Factor – Hardwire installation factor and the Engineered, Furnished & Installed Factor – Plug In, and specified that AT&T Data Request BFP-195 should be read to include all data from all SBC Illinois systems used to develop this factor as well as a detailed description of each item in each system used to develop this factor. SBC's response refers AT&T to its response to Staff Data Request PL 1.13(a-d). SBC's response to Staff Data Request PL 1.13(a-d) provides summary data only, and does not provide the level of detail specified in AT&T Data Request BFP-195. Please provide the detail requested.

SBC Response to AT&T Data Request BFP-204 AT&T Data Request BFP-204 asks for a series of very specific information concerning SBC's Design and Install Factors. SBC's response refers to its response to AT&T Data Request BFP-194. SBC's response to AT&T Data Request BFP-194 is not responsive to BFP-204. Please supplement SBC's response to AT&T Data Request BFP-204. Specifically, BFP-194 does not break down the Design and Install factors specifically identified in BFP-204 (such as cable placing, cable splicing).

SBC Response to AT&T Data Request BFP-208 AT&T Data Request BFP-208 requests SBC to produce the TELRIC fill factors mandated by each state commission within the SBC-Ameritech region. While SBC objected on relevance grounds, SBC's testimony in this case is riddled with testimony concerning fill factors adopted by state commissions outside the state of Illinois. Moreover, in its response to AT&T's March 27 Motion to Compel, SBC contends that fill factors that have actually been adopted by state commissions are relevant. As such, AT&T requests that SBC produce the fill factors adopted by state commissions for each

state in the SBC-Ameritech region to the extent it has not already done so in response to AT&T Data Requests MS-98 and MS-100.

SBC Response to AT&T Data Request BFP-237: In response to this request, SBC provided a PDF version of cost studies provided to the Commission Staff in ICC Docket Nos. 98-0252/98-0335/00-0764. AT&T Data Request BFP-237 requested that these studies be provided in an electronic format that allows manipulation. Please produce these studies in a version or format that allows for manipulation, as requested.

SBC Response to AT&T Data Request BFP-343: AT&T Data Requests BFP-343 requests the results, at the wire center level, that SBC obtained after running loop information through the pre-processor, which results are used as an input into the LoopCAT model. The results SBC provided in response to this request are consistent with the testimony of Mr. Smallwood and the version of LoopCAT SBC provided in this proceeding. It is inconsistent with the data SBC Illinois provided in response to Joint CLEC data request 1.98. Please either correct the LoopCAT filed as part of this proceeding and the response to this request or correct the response provided in response to Joint CLEC data request 1.98 immediately.

SBC Response to AT&T Data Request BFP-404: AT&T Data Request BFP-404 requests that SBC provide “a version of the LoopCAT that has the data in the tab PreProcess broken out by wire center or CLLI.” SBC responded by referring AT&T to SBC’s response to AT&T Data Request BFP-343, discussed above. AT&T Data Request BFP-404 does not request the same information as AT&T Data Request BFP-343 requests. Rather, AT&T Data Request BFP-404 requests that SBC provide a version of the LoopCAT that is able to run the data produced in response to AT&T Data Request BFP-343. Please provide this LoopCAT version immediately.

SBC Response to AT&T Data Request BFP-452: AT&T Data Request BFP-452 requests that SBC provide all analyses and documentation supporting “each number that is sourced as “Network” in Tab 7.1 column C of ‘DS3 Loop_R_ShslUNE_IL_02-05_OCT02.xls.’” The request further asked SBC to explain all adjustments it made to SBC’s embedded network information. SBC’s response does not provide the information requested. SBC’s assertion that the inputs into LoopCAT “are representative of the sizes used in normal practice” certainly does not contain any analyses or documentation as asked for in this request. Similarly, SBC’s assertion that the inputs into its cost studies “represent the number of DS3 circuits of each respective Ocn” also does not constitute any analysis or documentation. Further, because SBC has not identified any adjustments in these inputs that are different from its embedded network information.

Very truly yours,

Cheryl Urbanski Hamill

cc: Mr. Carmen Fosco
Mr. Owen E. MacBride
Ms. Susan Satter
Mr. William Dunkel
Mr. Darrell Townsley
Mr. Thomas Rowland